



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

SEP 10 1984

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

75 Davis Street
Providence, R.I. 02908

Letter of Deficiency
under the
Hazardous Waste Management Act

5 September 1984

Olin Hunt Sub II
RI 095976544

Mr. Alan R. Brodd, P.E.

Philip A. Hunt Chemical Corporation
Organic Chemical Division
One Wellington Road
Lincoln, RI 02865

RCRA RECORDS CENTER *eh(?)*
FACILITY OLIN HUNT SPECIALTY
I.D. NO. RI 095976544
FILE LOC. R-1B
OTHER [MOD]

Dear Mr. Brodd:

On 31 August 1984 personnel from the Department of Environmental Management conducted an inspection of your facilities on Wellington Road and Industrial Circle in Lincoln.

As a result of that inspection, it was determined that Philip A. Hunt Chemical Corporation is in violation of the following requirements of the Rules and Regulations for Hazardous Waste Generation, Transportation, Treatment, Storage, and Disposal.

1. You must submit a list of the names and signatures of those persons authorized to sign manifests. (Rule 5.09; both facilities.)
2. Records documenting that weekly inspections of hazardous waste storage areas have been conducted must be available for inspection. (Rule 5.02, 40 CFR 264.175; Industrial Circle.) Copies of these records should be submitted to this office.
3. Hazardous waste storage areas must be provided with spill containment capabilities. Specifically, the Department is concerned that the concrete floor of the storage area at the Wellington Road facility is not liquid tight. Vegetation growing through the expansion joints was observed, and the silicone sealant had begun to deteriorate.
4. The hazardous waste labels did not indicate the Environmental Protection Agency and Rhode Island waste types. (Rule 5.04; Wellington Avenue.)

5. (a) Comply with Items 1, 2, and 4 by 21 September 1984.
(b) Comply with Item 3 by 19 October 1984.

Failure to comply or to submit a request for an extension to any of the above violations will automatically result in the issuance of a Notice of Violation and Order. Enforcement actions resulting from continued non-compliance may result in a maximum fine of \$10,000/day and/or five (5) years imprisonment.

If you have any questions, please call me at 277-2797.

Sincerely,



Thomas A. Epstein
Engineer
Division of Air and Hazardous
Materials

TAE:jg

cc: Barbara O'Toole
EPA